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District of Nevada

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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KELLI ROSSOL,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00859-JCM-VCF

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm in response to Plaintiff's Motion and Memorandum to Remand (Dkt. No. 10) due on September 14, 2018, by 35 days, through and including October 19, 2018. Defendant further requests that all subsequent deadlines set forth in the Court's Order Concerning Review of Social Security Cases (Dkt. No. 7) shall be extended accordingly.

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1 Defendant requests this extension because of her attorney's heavy workload for the month of  
2 September 2018, which includes eight other cases that require imminent briefing. This request is made  
3 in good faith with no intention to unduly delay the proceedings.

4 Counsel for Defendant conferred with Plaintiff's counsel on September 13, 2018, who has  
5 indicated no opposition to this motion.

6 Respectfully submitted, September 13, 2018.

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8 DAYLE ELIESON  
United States Attorney

9 /s/ Beatrice Na  
10 BEATRICE NA  
Special Assistant United States Attorney

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12 IT IS SO ORDERED:

13   
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: 9-13-2018  
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1 **CERTIFICATE OF SERVICE**

2 I, **BEATRICE NA**, certify that the following individual was served with a copy of the  
3 **UNOPPOSED MOTION FOR EXTENSION OF TIME (First Request)** on the date and via the  
method of service identified below:

4 **CM/ECF:**

5 **Richard A Harris**

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9 **Joshua R Harris**

10 Richard Harris Law Firm  
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13 Dated: September 13, 2018

14 /s/ Beatrice Na  
15 BEATRICE NA  
16 Special Assistant United States Attorney  
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